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WRITER'S INTERNET ADDRESS:

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February 7, 2001

VIA FACSIMILE (312) 886-0747 AND**U.S. FIRST CLASS MAIL**

Leverett Nelson, Associate Regional Counsel

United States Environmental Protection Agency

Region 5

77 W. Jackson Blvd. - C14J

Chicago, IL 60604

Re: Schrieber/Caravan Drum site, 3033 Bourke, Detroit, Michigan. 48238
Site No. 05PY

Dear Mr. Nelson:

This letter will confirm our conversation of Monday, February 5, 2001 concerning the above-referenced subject.

As indicated, this law firm is counsel to Schrieber Corporation ("Schrieber"). A brief review of the itemized cost summary provided to Schrieber by the U.S. EPA under cover of Anthony Audia's December 22, 2000 letter reveals that there are significant charges that were incurred after Schrieber received confirmation from Peter Guria, On Site Coordinator, that all activities required by Administrative Order of Consent, Docket No. VW-92-C145 ("Consent Order") were completed. As I explained to you, the site work and all necessary reports were completed in approximately May 1993, and as you can see from the itemized cost summary prepared by this office, approximately \$56,027.26 in costs was for work allegedly incurred between 1998 and May 2000. I believe that these costs are in error, and you have agreed to check into this with the EPA's accounting office.

Frankly, the suggestion that Schrieber pay the EPA \$106,537.74 came as a complete shock to Schrieber. As you are aware, Paragraph 16 of the Consent Order required the EPA to submit an "Itemized Cost Summary annually or, if sooner, within sixty calendar days after submission of the Final Report." Schrieber submitted its final report in May 1993. Mr. Guria wrote to Schrieber on August 18, 1993 indicating that "this letter merely reflects U.S. EPA's determination that the work required by the Order was

Leverett Nelson
February 7, 2001
Page 2

completed" (copy of letter enclosed). Almost eight years has elapsed from the time the EPA, via Mr. Guria, confirmed that all work had been completed, and the date of the December 2000 invoice.

In addition, the itemized cost summary appended to your December 22, 2000 letter lacks sufficient detail to determine whether the expenditures were necessary and reasonable as required by the National Contingency Plan, 40 CFR Part 300 and CERCLA, 42 USC §9606(a). Please provide the undersigned with an indication as to the services performed by the various EPA employees and its contractors. Please confirm that the charges for the time period from 1994 and later are erroneous, deleting same. Please advise the undersigned as to the cause for the delay and the discount that the EPA will entertain due to its violation of the Consent Order. At a minimum, Schrieber should not be liable for any expenses after Mr. Guria's August 13, 1993 Completion of Work letter. The substance of Mr. Guria's letter, the violation of the consent Decree, paragraph 16, and the EPA's silence between August 1993 and December 2000 strongly suggest that Schrieber completed its obligations and that no additional monies are owed by Schrieber. Schrieber does not admit liability for any expenses incurred prior to the Guria letter, and requests a detailed explanation for these costs so it may determine whether they were necessary and reasonable as required by the National Contingency Plan. Finally, please confirm in writing that no interest will accrue pending receipt of an accurate invoice from the EPA.

Sincerely,

KERR, RUSSELL AND WEBER, PLC

A handwritten signature in black ink, appearing to read "Kurt R. Vilders", written in a cursive style.

Kurt R. Vilders

KRV/nef
Enclosure

cc: Chuck Rosa



SCHREIBER

AUG 1 6 1993

RECEIVED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 216
GROSSE ILE, MI 48138-1697

AUG 15 1993

REPLY TO ATTENTION OF
HSE1-G

Mr. Chuck Rosa
Schreiber Corporation
2239 Fenkell Road
Detroit, Michigan 48238

Mr. Robert Charleston
R.L. Enterprises
3033 Bourke Avenue
Detroit, Michigan 48238

RE: Completion of Work under Consent Order Docket No. V-W-92-C-145 for the
Schreiber/Caravan Drum Site, Detroit, Wayne County, Michigan
(Site ID #PY)

Dear Messrs. Rosa and Charleston:

The United States Environmental Protection Agency (U.S. EPA) issued an Administrative Order by Consent on March 23, 1992, to the Schreiber Roofing Company and Caravan Technologies, Inc., requiring that those parties perform specified removal activities at the Schreiber/Caravan site (the "site"). That Order was issued to address abandoned, leaking drums and contaminated soil which presented an imminent and substantial endangerment to the public health and welfare or the environment based on factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415 (b) (2).

Pursuant to that Order, the Schreiber Corporation and Caravan Technologies contracted Engineering Services (ESI) of Trenton, Michigan, to develop and submit a work plan on May 11, 1992, that outlined removal activities needed at the site. The U.S. EPA approved the work plan, as revised, on June 8, 1992.

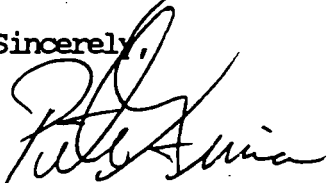
ESI submitted the final report on behalf of the Schreiber Roofing Company and Caravan Technologies, on May 12, 1993, describing their removal activities as required by the Order. An amendment to the final report was submitted on June 8, 1993. Based on my oversight of cleanup activities at the site, my review of the final amended report, and final inspection of the site on March 30, 1993, I conclude that the Schreiber Roofing Company and Caravan Technologies have completed the following activities in the approved work plan in accordance with the Order: implementation of site safety and security measures; implementation of an air monitoring program during site activities; sampling, characterization, staging, and securing of drummed wastes; sampling, characterization, and excavation of contaminated soil; post-excavation sampling to verify removal of identified contaminants in the soil; and transportation of wastes to a RCRA/CERCLA-approved disposal facility in

accordance with the U.S. EPA off-site policy. A total of 3,200 pounds of waste flammable liquids were shipped off site for incineration. Approximately 1,025 cubic yards of non-hazardous waste solids were transported for landfilling, and 29,500 gallons of non-hazardous liquids were shipped off site for treatment. All actions taken were consistent with the National Contingency Plan.

This letter merely reflects U.S. EPA's determination that the work required by the Order was completed. This notice of completion in no way releases the Schreiber Roofing Company or Caravan Technologies from any potential future obligations to perform additional work to address the same, or other, conditions at the site. Similarly, this notice of completion does not release the Schreiber Roofing Company or Caravan Technologies from any record keeping or other obligations under the Order that extend beyond the date of this notice.

Please contact me at (313) 692-7687 or Nancy-Ellen Zusman at (312) 886-7161 if you have any questions concerning this letter.

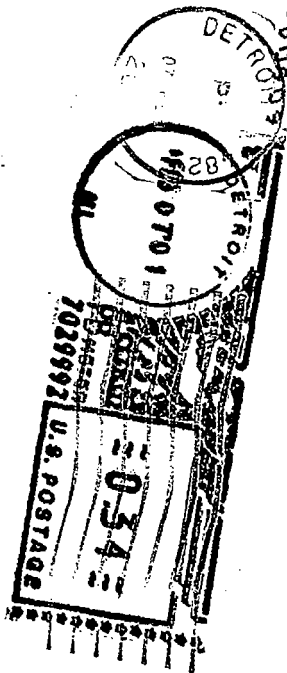
Sincerely,

A handwritten signature in dark ink, appearing to read "Peter Guria", is written over the word "Sincerely,".

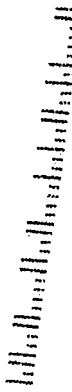
Peter Guria, On-Scene Coordinator
Emergency and Enforcement Branch - Section I

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United States Environmental Protection Agency
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48226-3427 10



ITEMIZED COST SUMMARY - EPA

ITEM	COSTS	YEARS
PAYROLL COSTS	\$ 4,710.92	1992 - 1995
INDIRECT COSTS		
	\$ 7,654.20	1992
	\$ 4,210.44	1993
	\$ 76.13	1994
	-\$ 1.57	1995
	\$ 0.00	1996
	\$ 0.00	1997
	\$ 631.34	1998
	\$ 0.00	1999
	\$ 15,145.14	2000
REGIONAL OVERSIGHT CONTRACT WITH TECHLAW	\$ 40,250.78	3/31/98 - 5/22/00
TECHNICAL ASSISTANCE TEAM CONTRACT WITH ECOLOGY & ENVIRONMENT, INC.	\$ 32,587.08	4/20/92 - 10/10/94
TECHNICAL ENFORCEMENT SUPPORT CONTRACT WITH METCALF & EDDY	\$ 1,273.28	2/20/92 - 5/15/92

TOTAL: \$106,517.74